EXHIBIT B

Case 3:19-cv-01057-B Document 92-2 Filed 01/18/21 Page 2 of 4 PageID 2264

From: Guy Holman <guy@joycelindauer.com>

Sent: Thursday, June 18, 2020 9:45 AM

To: Unis, Joseph; Swanson, David **Cc:** Joyce Lindauer; Finger, Anna K.

Subject: RE: Harrison's Second Set of Discovery Requests to A-Z and Barkat Ali

** External email **

Joseph,

We agree that objections have been waived and we intend to produce any responsive documents on or by the June 24th extension. The RFA's are deemed admitted.

Guy Harvey Holman, esq Joyce W. Lindauer Attorney, PLLC 1412 Main Street, Suite 500 Dallas, Texas 75202

Phone: 972.503.4033 Fax: 972.503.4034

Email: guy@joycelindauer.com

From: Unis, Joseph

Sent: Thursday, June 18, 2020 9:22 AM **To:** Guy Holman; Swanson, David **Cc:** Joyce Lindauer; Finger, Anna K.

Subject: RE: Harrison's Second Set of Discovery Requests to A-Z and Barkat Ali

Guy,

Your responses were due on or before June 15, 2020. If you disagree, please let me know why. If you agree, you've waived any objection to any discovery request and the admissions are deemed admitted.

If you're writing to ask us not to file a motion to compel because you are representing that you will respond, without objection, to the discovery (including production of all responsive documents) on or before June 24, 2020, please confirm that is your request and we'll respond.

Let me know if you have questions or want to discuss.

Thanks.

Joe Unis Locke Lord LLP

2200 Ross Avenue, Suite 2800

Dallas, TX 75201 T: 214-740-8448 F: 214-756-8668

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junis@lockelord.com www.lockelord.com

From: Guy Holman < guy@joycelindauer.com>

Sent: Wednesday, June 17, 2020 6:38 PM

To: Unis, Joseph < <u>JUnis@lockelord.com</u>>; Swanson, David < <u>dswanson@lockelord.com</u>>

Cc: Joyce Lindauer <joyce@joycelindauer.com>; Finger, Anna K. <Anna.K.Finger@lockelord.com>

Subject: RE: Harrison's Second Set of Discovery Requests to A-Z and Barkat Ali

** External email **

Joseph—we are requesting a seven (7) day extension on your Second Set of Discovery Requests until Wednesday June 24, 2020.

Guy

Guy Harvey Holman, esq Joyce W. Lindauer Attorney, PLLC 1412 Main Street, Suite 500 Dallas, Texas 75202

Phone: 972.503.4033 Fax: 972.503.4034

Email: guy@joycelindauer.com

From: Unis, Joseph < <u>JUnis@lockelord.com</u>> Sent: Thursday, May 14, 2020 2:04 PM

To: Swanson, David <dswanson@lockelord.com>; Guy Holman <guy@joycelindauer.com>

Cc: Joyce Lindauer < joyce@joycelindauer.com >; Finger, Anna K. < Anna.K.Finger@lockelord.com >

Subject: Harrison's Second Set of Discovery Requests to A-Z and Barkat Ali

Guy,

Please see the attached discovery requests to A-Z and to Barkat Ali.

Best,

Joe Unis Locke Lord LLP 2200 Ross Avenue, Suite 2800 Dallas, TX 75201

T: 214-740-8448 F: 214-756-8668 junis@lockelord.com www.lockelord.com Atlanta | Austin | Boston | Brussels | Chicago | Cincinnati | Dallas | Hartford | Hong Kong | Houston | London | Los Angeles | Miami | New Orleans | New York | Princeton | Providence | San Francisco | Stamford | Washington DC | West Palm Beach

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